

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In Re:	)	
	)	No. 24-08292
Shirley Marie Mackey,	)	Janet S. Baer
	)	Chapter 13
Debtor(s).	)	Geneva

**NOTICE OF MOTION**

To: SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that on **September 6, 2024 at 9:30 AM**, I will appear before the Honorable Janet S. Baer, or any judge sitting in that judge's place, either in **Courtroom 615** of the **Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn Street, Chicago, IL 60604**, or electronically as described below, and present the motion of **Debtor** for **Extension of Time to File Plan**, a copy of which is attached.

**Important: Only parties and their counsel may appear for presentment of the motion electronically using Zoom for Government. All others must appear in person.**

**To appear by video**, use this link: <https://www.zoomgov.com/join>. Then enter the meeting ID and password.

**To appear by telephone**, call Zoom for Government at 1-669-254-5252 or 1-646-828- 7666. Then enter the meeting ID and password.

**Meeting ID and passcode.** The meeting ID for this hearing is: **160 731 2971**, **Passcode is 587656**. The meeting ID and passcode can also be found on the judge's page on the court's website.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

/s/ Vaughn White  
Vaughn White  
VW LAW LLC  
Attorney for Debtor(s)  
1700 Park St, Suite 203  
Naperville, IL 60563  
630-429-9010  
vaughn@vaughnwhite.com  
ARDC # 6198291

CERTIFICATE OF SERVICE

I, Vaughn A. White, an attorney, certify that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on August 23, 2024.

/s/ Vaughn White  
Vaughn White

In re:  
Shirley Marie Mackey  
Debtor

Case No. 24-08292-JSB  
Chapter 13

## CERTIFICATE OF NOTICE

District/off: 0752-1  
Date Rcvd: Aug 14, 2024

User: admin  
Form ID: 309I

Page 1 of 2  
Total Noticed: 9

The following symbols are used throughout this certificate:

Symbol	Definition
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+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.
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Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Aug 16, 2024:

Recip ID	Recipient Name and Address
db	+ Shirley Marie Mackey, 4325 Bayhead Ct, Aurora, IL 60504-5084

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
aty	Email/Text: vaughn@vaughnwhite.com	Aug 14 2024 23:03:00	Vaughn A White, Vw Law LLC, 1700 Park St, Suite 203, Naperville, IL 60563
tr	+ Email/Text: mcguckin_m@lisle13.com	Aug 14 2024 23:04:00	Glenn B Stearns, 801 Warrenville Road Suite 650, Lisle, IL 60532-4350
ust	+ Email/Text: USTPREGION11.ES.ECF@USDOJ.GOV	Aug 14 2024 23:05:00	Patrick S Layng, Office of the U.S. Trustee, Region 11, 219 S Dearborn St, Room 873, Chicago, IL 60604-2027
30876748	Email/Text: cs@aldouslegal.com	Aug 14 2024 23:04:00	Aldous and Associates, PLLC, Attn: Bankruptcy, PO Box 171374, Holladay, UT 84117-1374
30876749	+ EDI: CAPITALONE.COM	Aug 15 2024 02:40:00	Capital One, PO Box 30285, Salt Lake City, UT 84130-0285
30876750	+ Email/PDF: creditonebknotifications@resurgent.com	Aug 14 2024 23:07:08	Credit One Bank, 6801 S Cimarron Rd, Las Vegas, NV 89113-2273
30876751	Email/Text: bankruptcy@nationalcreditsystems.com	Aug 14 2024 23:03:00	National Credit Systems, Inc., Attn: Bankruptcy, P.O. Box 672288, Atlanta, GA 30006
30876752	+ Email/PDF: RACBANKRUPTCY@BBANDT.COM	Aug 14 2024 23:06:59	Regional Acceptance Corp, Attn: Bankruptcy 1424 E Firetower Rd, Greenville, SC 27858-4105

TOTAL: 8

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

District/off: 0752-1  
Date Rcvd: Aug 14, 2024  
Date: Aug 16, 2024

User: admin  
Form ID: 309I  
Signature: /s/Gustava Winters

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Total Noticed: 9

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on August 14, 2024 at the address(es) listed below:

Name	Email Address
Glenn B Stearns	stearns_g@lisle13.com
Patrick S Layng	USTPRegion11.ES.ECF@usdoj.gov
Vaughn A White	on behalf of Debtor I Shirley Marie Mackey vaughn@vaughnwhite.com vaughn@vaughnwhite.com;paralegal@vaughnwhite.com;VWLAWLLC@jubileebk.net

TOTAL: 3

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN RE:	)	
	)	Case No. 23-08292
SHIRLEY MARIE MACKEY,	)	
Debtor	)	Chapter 13
	)	Judge Janet S. Baer

**MOTION TO EXTEND TIME TO FILE PLAN**

NOW COMES the Debtor, Shirley Marie Mackey, by attorney Vaughn A. White, and moves this Court to grant an extension until September 6, 2024, to file Debtor's Chapter 13 Plan.

In support of this Motion, the Debtor respectfully states and alleges as follows:

1. On June 4, 2024, Debtor filed a Chapter 7 Petition.
2. On July 14, 2024, Debtor filed a Motion to Convert the case to one under Chapter 13.
3. On August 9, 2024, Debtor's motion was granted, and the matter was converted to a Chapter 13 case.
4. Debtor's Chapter 13 Plan is due on August 23, 2024.
5. Debtor and Debtor's Counsel need additional time to gather information and review and/or amend Debtor's Schedules and to file Debtor's Plan.
6. Debtor, therefore, respectfully requests additional time be granted to September 6, 2024, to file Debtor's Plan.

WHEREFORE, Debtor prays for the following relief:

- A. That Debtor be granted until September 6, 2024, to file Plan, and other documents; and
- B. For such other and further relief as this Court deems equitable and just.

Respectfully Submitted,

/s/ Vaughn A. White  
Vaughn A. White  
Attorney for Debtor

Vaughn A. White  
Illinois ARDC # 6198291  
VW LAW LLC  
Attorney for Debtor(s)  
1700 Park St, Suite 203  
Naperville, IL 60563  
630-429-9010  
vaughn@vaughnwhite.com